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9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

12 NEELAM SANDHU, an individual,

13 Plaintiff,

14 vs.

15 BLACKBERRY CORPORATION, a
Delaware Corporation,

16 Defendant.

Case No. 3:24-cv-02002-SK

**REVISED [PROPOSED] ORDER RE:
MOTION TO FILE UNDER SEAL
MATERIALS SUBMITTED IN
CONNECTION WITH DEFENDANT
BLACKBERRY CORPORATION'S
MOTION FOR SUMMARY JUDGMENT**

Judge: Hon. Sallie Kim

Having considered Defendant BlackBerry Corporation's Motion to File Under Seal filed concurrently with its Motion for Summary Judgment and supporting exhibits, as well as the party declarations submitted in support of this administrative motion and any materials submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5;

IT IS HEREBY ORDERED:

The following portions of papers related to Defendant's Motion for Summary Judgment and supporting documents may be filed under seal:

Document	Portion Containing Designated Information	Designating Party	Ruling
Motion for Summary Judgment, Dkt. 111	Page 1, lines 25-27 Page 7, lines 26-27 Page 9, line 1	BlackBerry, <i>see</i> Bramhill Decl. iso Sealing ("Bramhill Decl.") p. 2.	
Exhibit 1 to Declaration of Lauren Beck ("Beck Decl.")	Page 22, lines 22, 23 Page 56, lines 11, 14-15, 17, 19, 20-25 Page 58, lines 7-8, 14, 20 Page 59, lines 2-7, 17 Page 60, lines 3-4, 5-11 Page 105, line 1 Page 107, lines 8, 11, 14	BlackBerry, <i>see</i> Bramhill Decl., p. 2.	
Exhibit 2 to Beck Decl.	Pages 1-6 (names)	BlackBerry, <i>see</i> Bramhill Decl., pp. 2-3.	
Exhibit 3 to Beck Decl.	Page 93, lines 23-24 Page 94, lines 16, 25 Page 95, lines 9-15, 23 Page 96, lines 1-2, 7, 10 Page 226, lines 5, 7	BlackBerry, <i>see</i> Supplemental Declaration of Jennifer Bramhill (" Supp. Bramhill Decl. "), p. 2.	
Exhibit 5 to Beck Decl.	Page 1 (PII in To: line) (customer name in Attachments: line)	BlackBerry, <i>see</i> Bramhill Decl., p. 3.	
Exhibit 8 to Beck Decl.	Page 11 (PII phone numbers) Page 14 (customer name) Page 15 (PII phone numbers)	BlackBerry, <i>see</i> Bramhill Decl., p. 3.	
Exhibit 9 to Beck Decl.	Page 5, lines 18-19 (names) Page 6, lines 18, 19 (customer name) Page 10, lines 1-2 (name)	BlackBerry, <i>see</i> Supp. Bramhill Decl. , pp. 2-3.	

	Page 16, lines 10-11, 18-26 (names and identifiers) Page 17, lines 12-16, 21-25 (names and identifiers) Page 18, lines 3, 5, 7, 12, 19, 22, 28 (names and identifiers) Page 19, lines 1, 4 (names) Page 20, lines 7-12		
Exhibit 10 to Beck Decl.	Page 1 (names) Page 3 (names)	BlackBerry, <i>see</i> Bramhill Decl., p. 4.	
Exhibit 11 to Beck Decl.	Page 1 (PII phone number)	BlackBerry, <i>see</i> Bramhill Decl., p. 4.	
Exhibit 13 to Beck Decl.	Page 1 (PII phone number)	BlackBerry, <i>see</i> Bramhill Decl., p. 4.	
Exhibit 19 to Beck Decl.	Page 1 (identifier) Page 2	BlackBerry, <i>see</i> Bramhill Decl., p. 4.	
Exhibit 20 to Beck Decl.	Page 59, line 19 – page 63, line 9 Page 67, line 15 – page 69, line 11 Page 69, lines 12, 17-21, 23 Page 70, lines 5, 13, 17 Page 72, line 21 – page 73, line 16 Page 75, line 10 – page 76, line 1 Page 76, lines 12-18 Page 142, line 25 – page 143, line 8 Page 143, line 22 – page 144, line 116 Page 157, lines 13-19 Page 183, line 10 - page 184, line 2 Page 201, lines 22-25 Page 202, lines 12-23 Page 203, lines 8-14 Page 214, lines 12-19 Page 215, lines 1-5 Page 254, line 7 – page 255, line 2 Page 255, line 13-16, 22-25 Page 256, line 1- page 257, line 15 Page 257, lines 18-20 Page 258, line 12 – page 259, line 1 Page 260, line 1 Page 261, lines 12-17, 24-25 Page 262, line 3 – page 263, line 10	BlackBerry, <i>see</i> Bramhill Decl., pp. 5-6.	

Exhibit 21 to Beck Decl.	Page 1	BlackBerry, <i>see</i> Bramhill Decl., p. 5.	
Exhibit 25 to Beck Decl.	Page 3 (names) Page 4 (names and identifier)	BlackBerry, <i>see</i> Bramhill Decl., p. 5.	
Exhibit 26 to Beck Decl.	Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 (names) Page 9 (names and identifier) Page 11 (names and identifier) Page 12 (names) Page 13 Page 14 Page 15 Page 16 Page 19 (identifier) Pages 20-22 Pages 23-24 (names) Pages 25-28 Pages 29-31 Page 32 (names) Pages 33-39	BlackBerry, <i>see</i> Bramhill Decl., pp. 5-6.	
Exhibit 27 to Beck Decl.	Page 1 (PII in To: line) Page 6 (names and identifier) Page 7 (names and identifiers) Page 8 (name) Page 9 (names and identifier) Page 10 (names and identifier) Page 11 (names and identifiers) Page 13 (names) Page 15 (names) Page 16 (name) Pages 20-23	BlackBerry, <i>see</i> Bramhill Decl., p. 5.	

1	Exhibit 29	Page 2-3, 5-6, 8-9, 11-13, 15-27	BlackBerry, <i>see</i>	
2	to Beck Decl.	(customer names)	Bramhill Decl., p. 6.	
3	Exhibit 30	Page 97, line 18 – page 100, line 20	BlackBerry, <i>see</i> Supp.	
4	to Beck Decl.	Page 106, line 9 – page 107, line 20	Bramhill Decl. , pp. 3-4.	
5		Page 135, line 10-22 (name and		
6		identifiers)		
7		Page 177, lines 12 – Page 178, line 21		
8		Page 251, line 15 – Page 253, line 9		
9		Page 255, line 16 (names)		
10	Exhibit 31	Page 66, line 1 – page 68, line 4	BlackBerry, <i>see</i> Supp.	
11	to Beck Decl.	Page 187, lines 2-6, 18-25	Bramhill Decl. , p. 4.	
12		Page 188, lines 1-22		
13		Page 189, lines 18-25		
14	Exhibit 33	Page 2	BlackBerry, <i>see</i>	
15	to Beck Decl.		Bramhill Decl., p. 7.	
16				
17	Exhibit 34	Page 1 (PII in to: line)	BlackBerry, <i>see</i> Supp.	
18	to Beck Decl.	Page 1-2 (names and identifiers)	Bramhill Decl. , p. 4.	
19				
20	Exhibit 35	Page 1 (PII health information)	BlackBerry, <i>see</i>	
21	to Beck Decl.		Bramhill Decl., p. 7.	
22				
23	Exhibit 38	Page 1 (PII phone numbers)	BlackBerry, <i>see</i>	
24	to Beck Decl.		Bramhill Decl., p. 7.	
25				
26	Exhibit 40	Page 1 (PII phone numbers)	BlackBerry, <i>see</i>	
27	to Beck Decl.		Bramhill Decl., p. 8.	
28				
	Exhibit 41	Page 2 (customer names)	BlackBerry, <i>see</i>	
	to Beck Decl.		Bramhill Decl., p. 8.	
	Exhibit 44	Page 26, line 11	BlackBerry, <i>see</i>	
	to Beck Decl.	Page 32, line 20	Bramhill Decl., p. 8.	
		Page 33, lines 1-2		
		Page 38, line 22		
		Page 41, lines 1, 24-25		
		Page 42, lines 6, 8-9, 23, 25		

	Page 43, lines 3, 6, 16, 20, 23 Page 44, line 1 Page 61, lines 18-19, 24 Page 107, line 2		
Exhibit 45 to Beck Decl.	Page 26, line 17 Page 27, line 21 Page 28, lines 7, 9, 14 Page 30, line 9 Page 35, line 3 Page 36, lines 5, 8, 10, 12 Page 55, line 9 Page 57, lines 2, 4-5 Page 58, lines 6, 9 Page 59, lines 14, 23 Page 62, lines 10, 11	BlackBerry, <i>see</i> Bramhill Decl., p. 8.	
Exhibit 46 to Beck Decl.	Page 41, lines 16-17 Page 76, lines 13, 22 Page 80, line 10 Page 81, lines 4-5 Page 82, line 9 Page 83, lines 15, 16, 21 Page 84, lines 1, 3 Page 85, lines 7, 11, 25 Page 86, lines 5, 13, 22 Page 87, line 3 Page 91, line 2 Page 101, line 15	BlackBerry, <i>see</i> Bramhill Decl., p. 8.	
Exhibit 47 to Beck Decl.	Page 30, lines 15, 17, 18 Page 31, lines 4, 8, 15, 18, 19, 20, 25 Page 32, lines 2 Page 54, lines 19 and 20	BlackBerry, <i>see</i> Bramhill Decl., p. 8.	
Exhibit 48 to Beck Decl.	Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 11 Page 12 Page 13 Page 14 Page 16	BlackBerry, <i>see</i> Declaration of P. Kurtz , pp. 2-3.	

Exhibit 49 to Beck Decl.	Page 64, line 18 Page 65, lines 1, 4, 7, 12, 16, 19, 24 Page 66, line 25 Page 67, lines 2, 6, 10 Page 68, lines 2, 10, 14, 18 Page 69, lines 13, 18, 19 Page 70, lines 6, 9 Page 75, lines 9-20 Page 76, lines 13, 23 Page 78, lines 7, 12, 15, 20 Page 79, lines 5, 7, 12-15, 20, 22 Page 80, lines 1, 10, 12, 20, 22, 25 Page 81, lines 2, 13, 22, 25	<i>see</i> Supp. Bramhill Decl., p. 5.	
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IT IS SO ORDERED.

DATED: _____, 2025

HON. SALLIE KIM

United States District Judge

Northern District of California